



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 04-033

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated October 2002.]

2. Form, Style and Placement in Administrative Code

a. The statement in the analysis of the statutes interpreted by the rule is sweepingly broad. Certainly, this rule does not interpret three chapters of the statutes in their entirety. Something more precise should be stated.

b. The rule repeals and recreates entire tables and extensive notes. This may be well justified by extensive changes being made in the tables and notes, but it makes it very difficult to determine how the rule has been changed. If the changes are not extensive, the department may want to consider amending (or repealing and recreating) individual lines of the tables and individual notes. This approach was taken in the treatment of the notes to Table BM.

c. The creation of Table ES and the related notes should be placed before the repeal and recreation of Table F and its related notes.